

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.    <u>09 -</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:       <u>                    </u></b>
<b>JAIME VERDIN-PEREZ</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>MIGUEL VERDIN-PEREZ</b>	<b>:</b>	<b>21 U.S.C. § 846 (conspiracy to</b>
<b>AGUSTIN VERDIN</b>	<b>:</b>	<b>distribute five kilograms or more</b>
<b>EDGAR VERDIN-DIAZ</b>	<b>:</b>	<b>of cocaine – 1 count)</b>
	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (possession</b>
	<b>:</b>	<b>with intent to distribute five</b>
	<b>:</b>	<b>kilograms or more of cocaine – 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c) (possession of</b>
	<b>:</b>	<b>firearm in furtherance of drug</b>
	<b>:</b>	<b>trafficking crime – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of Forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1.       From in or about June 23, 2009 to on or about July 1, 2009, in the Eastern District of Pennsylvania, defendants

**JAIME VERDIN-PEREZ,  
MIGUEL VERDIN-PEREZ,  
AGUSTIN VERDIN, and  
EDGAR VERDIN-DIAZ**

conspired and agreed, together and with others unknown to the grand jury, to knowingly and intentionally distribute five kilograms or more, that is, approximately 44 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

### **MANNER AND MEANS**

It was a part of the conspiracy that:

2. Defendants JAIME VERDIN-PEREZ and AGUSTIN VERDIN obtained a supplier for the cocaine.

3. Defendants JAIME VERDIN-PEREZ, MIGUEL VERDIN-PEREZ, AGUSTIN VERDIN and EDGAR VERDIN-DIAZ received the delivery of cocaine in King of Prussia, Pennsylvania.

4. Defendant MIGUEL VERDIN-PEREZ stored the cocaine at his residence in Norristown, Pennsylvania.

5. Defendants MIGUEL VERDIN-PEREZ and JAIME VERDIN-PEREZ obtained a buyer in Philadelphia, Pennsylvania, for some of the cocaine.

6. Defendants JAIME VERDIN-PEREZ and AGUSTIN VERDIN obtained a vehicle to transport the cocaine to Philadelphia, Pennsylvania.

7. Defendants JAIME VERDIN-PEREZ, AGUSTIN VERDIN and EDGAR VERDIN-DIAZ traveled from Norristown, Pennsylvania, to Philadelphia, Pennsylvania, to deliver cocaine to the buyer.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendants JAIME VERDIN-PEREZ, MIGUEL VERDIN-PEREZ, AGUSTIN VERDIN, and EDGAR VERDIN-DIAZ, and others unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On June 23, 2009:

1. A person unknown to the grand jury (hereinafter referred to as the “buyer”) met with defendant MIGUEL VERDIN-PEREZ to discuss a potential cocaine deal, and the buyer told defendant MIGUEL VERDIN-PEREZ that the buyer would be interested in purchasing cocaine from him in the future.

On June 30, 2009:

2. Defendants JAIME VERDIN-PEREZ and AGUSTIN VERDIN were notified by a person (or persons) unknown to the grand jury that a large quantity of cocaine was in a parked car in King of Prussia, Pennsylvania, waiting for them to pick it up.

3. In the early evening, defendants JAIME VERDIN-PEREZ, MIGUEL VERDIN-PEREZ, AGUSTIN VERDIN (who are brothers), and EDGAR VERDIN-DIAZ (their cousin) traveled to the designated location in King of Prussia, Pennsylvania, and took possession of 44 kilograms of cocaine.

4. Defendants JAIME VERDIN-PEREZ, MIGUEL VERDIN-PEREZ, AGUSTIN VERDIN, and EDGAR VERDIN-DIAZ then traveled to the residence of defendant MIGUEL VERDIN-PEREZ at 525 East Moore Street in Norristown, Pennsylvania, where the cocaine was stored.

On July 1, 2009:

5. At or about 9:30 a.m., defendant MIGUEL VERDIN-PEREZ called the buyer and offered to meet later that day to discuss the sale of cocaine. After additional phone calls, the meet location was agreed upon as a parking lot at 5<sup>th</sup> and Lycoming Streets in Philadelphia, Pennsylvania.

6. That morning, defendants JAIME VERDIN-PEREZ and AGUSTIN VERDIN purchased a red, two-door Accord specially fitted with a hidden compartment in the rear passenger area of the vehicle to be used for hiding cocaine when delivering it to customers.

7. At approximately 12:15 p.m., defendants MIGUEL VERDIN-PEREZ and JAIME VERDIN-PEREZ arrived at the parking lot at 5<sup>th</sup> and Lycoming Streets in Philadelphia, Pennsylvania, driving a gold Ford Explorer and a red Honda Accord, respectively.

8. Once the vehicles were parked, the buyer entered the front passenger side of the Accord, and defendant MIGUEL VERDIN-PEREZ exited the Explorer and walked to the driver side of the Accord, and the buyer and defendants MIGUEL VERDIN-PEREZ and JAIME VERDIN-PEREZ discussed the sale of cocaine.

9. During the meeting at 5<sup>th</sup> and Lycoming Streets, defendants MIGUEL VERDIN-PEREZ and JAIME VERDIN-PEREZ provided the buyer with a sample of cocaine, which was stored in the hidden compartment, and defendants MIGUEL VERDIN-PEREZ and JAIME VERDIN-PEREZ agreed to sell one kilogram of cocaine to the buyer for \$31,000 at a location in Philadelphia later that afternoon.

10. After the meeting with the buyer ended, defendant MIGUEL VERDIN-PEREZ returned to the Explorer, and he and defendant JAIME VERDIN-PEREZ drove their respective vehicles directly to the residence of defendant MIGUEL VERDIN-PEREZ at 525 East Moore Street in Norristown, Pennsylvania, arriving at approximately 1:01 p.m.

11. For the next 15 to 20 minutes, defendants MIGUEL VERDIN-PEREZ and JAIME VERDIN-PEREZ walked in and out of the residence at 525 East Moore Street and back and forth from the Accord, which had its trunk open.

12. At approximately 1:32 p.m., defendant JAIME VERDIN-PEREZ entered the driver-side of the Accord and defendant AGUSTIN VERDIN entered the driver-side of the Explorer, and the vehicles left the area and headed towards Philadelphia.

13. Defendant EDGAR VERDIN-DIAZ accompanied defendant AGUSTIN VERDIN in the Explorer.

14. At approximately 2:45 p.m., the buyer received a phone call instructing the buyer to meet at a parking lot located at Castor Avenue and Wyoming Street in Philadelphia, Pennsylvania, and the caller stated that he would be at that location shortly.

15. At approximately 2:56 p.m., the Accord and the Explorer arrived at the parking lot at Castor Avenue and Wyoming Street in Philadelphia, Pennsylvania.

16. At approximately 3:00 p.m., the buyer arrived at that location, and the buyer and defendant JAIME VERDIN-PEREZ agreed to re-locate to another location, which was thereafter agreed upon as G Street and Hunting Park Avenue in Philadelphia, Pennsylvania.

17. At approximately 3:10 p.m., defendants JAIME VERDIN-PEREZ, AGUSTIN VERDIN and EDGAR VERDIN-DIAZ, and the buyer, arrived at the parking lot located at G Street and Hunting Park Avenue in Philadelphia, Pennsylvania, where they were approached by law enforcement and arrested. The Accord was found to contain 10 kilograms of cocaine (one under the driver's seat and nine in the hidden compartment), and defendant MIGUEL VERDIN-PEREZ was found at his residence at 525 East Moore Street, Norristown, Pennsylvania, with the remaining 34 kilograms of cocaine, one .380 caliber High Point handgun (serial no. P77816) loaded with six live rounds of ammunition, and packaging materials.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

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**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 1, 2009, in Norristown and Philadelphia, in the Eastern District of Pennsylvania, defendants

**JAIME VERDIN-PEREZ,  
MIGUEL VERDIN-PEREZ,  
AGUSTIN VERDIN, and  
EDGAR VERDIN-DIAZ**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, five kilograms or more, that is, approximately 44 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 1, 2009, in Norristown, in the Eastern District of Pennsylvania,  
defendants

**JAIME VERDIN-PEREZ,  
MIGUEL VERDIN-PEREZ,  
AGUSTIN VERDIN, and  
EDGAR VERDIN-DIAZ**

knowingly possessed, and aided and abetted the possession of, a firearm and ammunition, that is, one .380 caliber High Point handgun (serial no. P77816) loaded with six live rounds of ammunition, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to knowingly and intentionally distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), all in violation of Title 21, United States Code, Section 846, and possession with intent to distribute of, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 18, United States Code, Sections 924(c)(1) and (2).

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this indictment, defendants

**JAIME VERDIN-PEREZ,  
MIGUEL VERDIN-PEREZ,  
AGUSTIN VERDIN, and  
EDGAR VERDIN-DIAZ,**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense(s), including, but not limited to:

Honda Accord (PA registration HHL-9878);

Infiniti SUV (Pennsylvania registration HHD-9876); and

one .380 caliber High Point handgun (serial no. P77816) and six live rounds of ammunition;

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided



without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**

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**FOREPERSON**

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**MICHAEL L. LEVY**  
**United States Attorney**